

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

JOHN DEREK MURPHY,
Petitioner

CIVIL ACTION
NO. 05-10548-JLT

v.

MICHAEL A. THOMPSON,
MCI SHIRLEY, SUPERINTENDENT
Respondent

**PETITIONER'S ASSENTED-TO MOTION FOR
PERMISSION TO FILE REPLY MEMORANDUM IN BY OCTOBER 11, 2005**

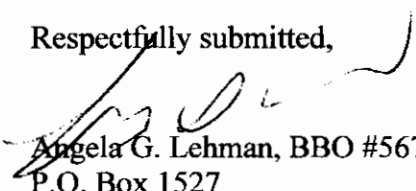
Now comes the petitioner in the above-entitled actions and respectfully moves this Honorable Court for permission to continue his filing date for his reply memorandum in support of his petition for a writ of habeas corpus from September 30th to October 11, 2005. As grounds therefore, undersigned counsel for the petitioner states that she needs an additional eleven days to complete the necessary research and writing for the reply. Counsel started but was unable to complete the reply in large part because she was away for much of the month. Counsel has also been working on a motion for a new trial based upon ineffective assistance of counsel and a brief due in the Appeals Court in addition to this reply memorandum.

Pursuant to LR 7.1(A)(2) counsel for the petitioner certifies he resolved the above matter with Assistant Attorney General Maura McLaughlin, who has assented to this motion.

CONCLUSION

For the foregoing reasons, petitioner requests that the Court grant his motion.

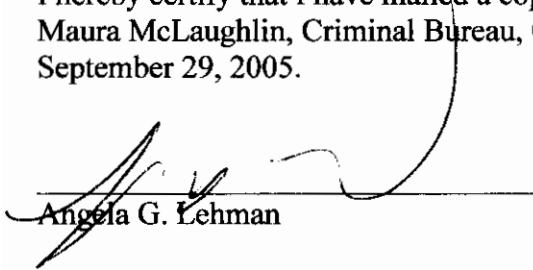
Respectfully submitted,


Angela G. Lehman, BBO #567411
P.O. Box 1527
Somerville, MA 02144
617-625-0807

Date: September 29, 2005

CERTIFICATE OF SERVICE

I hereby certify that I have mailed a copy of the within Assented-to Motion to AAG Maura McLaughlin, Criminal Bureau, One Ashburton Place, Boston, MA 02108 on September 29, 2005.



Angela G. Lehman